



# Oregon

Theodore Kulongoski, Governor

## Department of Environmental Quality

Northwest Region Portland Office

2020 SW 4<sup>th</sup> Avenue, Suite 400

Portland, OR 97201-4987

(503) 229-5263

FAX (503) 229-6945

TTY (503) 229-5471

January 7, 2008

*Also Sent Via E-mail*

Mr. Robert J. Wyatt  
Northwest Natural Gas Company  
220 N.W. Second Avenue  
Portland, OR 97209

**Re: Source Control Data Gaps Work Plan (Section 2)  
Northwest Natural Gas Company Site  
Portland, Oregon  
ECSI No. 84**

Dear Mr. Wyatt:

The Oregon Department of Environmental Quality (DEQ) has reviewed the "Source Control Data Gaps Work Plan – Section 2, Catch Basin Sediment and Stormwater Sample Collection, Processing, and Analysis Procedures, NW Natural Gasco Site, 7900 NW St. Helens Road, Portland, Oregon" dated November 2007. The document provides the revised version of Section 2 of the Data Gaps Work Plan<sup>1</sup> submitted previously. The Data Gaps Work Plan was prepared to support the ongoing source control evaluation of the former Gasco Site uplands. The document focused on identifying and addressing data gaps related to assessing the facility as a source of contamination to the Willamette River.

Section 2 of the Data Gaps Work Plan presented the Northwest Natural Gas Company (NW Natural) proposal for assessing the facility's stormwater conveyance system as a potential contaminant transport pathway to the river. DEQ refers to the revised version of Section 2 as the "Stormwater Pathway Work Plan" in this letter. Anchor Environmental, LLC (Anchor) and Hahn and Associates, Inc. (Hahn) jointly prepared the Stormwater Pathway Work Plan on behalf of NW Natural.

Based on our review of the Stormwater Pathway Work Plan, DEQ acknowledges the document: 1) has been revised consistent with DEQ's August 15, 2007 comments letter; and 2) reflects agreements reached between NW Natural and DEQ during a meeting convened on October 31, 2007 to discuss sampling locations.

DEQ approves the Stormwater Pathway Work Plan subject to the following clarifying comments.

**Section 2.1.** In describing Area D, the Stormwater Pathway Work Plan indicates that truck wash water produced in the Fuel and Marine Marketing lease area drains through two catch basins before flowing into the sump located in the western portion of the tank berm. DEQ can only

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<sup>1</sup> Anchor Environmental, LLC and Hahn and Associates, Inc., 2007, "Source Control Data Gaps Work Plan, NW Natural Gasco Site, 7900 NW St. Helens Road, Portland, Oregon," July, a work plan prepared on behalf of the Northwest Natural Gas Company.

locate one catch basin in figures 2 and 3. In addition, the location of the truck washing operation is not indicated on either figure. Figures 2 and 3 should be reviewed and revised as appropriate for future submittals.

**Section 2.3.1.** NW Natural indicates in the second paragraph that with regard to sediment sampling in Drainage Basin A, “A fourth sample, SS-A4, or possibly a second catch basin for composite with the sediment in A3, will be determined by DEQ upon review of this Work Plan Revision.” NW Natural should be advised that DEQ expects discrete sediment samples to be collected from catch basins SS-A3 and SS-A4 for analysis. This comment should also be incorporated into Table 3.

**Section 2.5.2.** DEQ expects NW Natural to provide an addendum to the Stormwater Pathway Work Plan if ISCO samplers are used to collect stormwater samples. The addendum should provide detailed information regarding the sampling equipment and its use, including but not necessarily limited to; sampler deployment location(s), data collection objectives, sampling frequency, and sample collection and handling procedures.

**Section 2.5.4.** DEQ expects field documentation of stormwater system sediment and stormwater sampling activities to include the information items indicated in sections 4.4 and 5.5 of Attachment C (“Framework for Portland Harbor Storm Water Screening Evaluations”) to Appendix D of the Joint Source Control Strategy<sup>2</sup> (JSCS).

In addition, DEQ considers visual estimates of stormwater flow to be inadequate for purposes of the source control evaluation. Stormwater discharge should be measured at outfalls using methods appropriate for the conditions encountered in the field such as; 1) recording the time it takes to fill a container of known volume; or 2) published flow tables based on the size/slope of the pipe. Multiple measurements should be made at each outfall during a sampling event. Individual measurements and the average discharge should be reported to DEQ.

**Section 2.5.7.** Details of chain-of-custody documentation are not included in the Stormwater Pathway Work Plan; DEQ presumes the following list of items will be recorded on all chain-of-custody forms used for the project:

- Project name and reference number
- Sample identification number
- Sample collector’s signature
- Date and time of sample collection
- Description of sample (i.e., sample matrix)
- Analyses requested
- Number of sample containers
- Sample shipping container custody seal identification information

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<sup>2</sup> EPA and DEQ, 2005, “Portland Harbor Joint Source Control Strategy – Final,” December (note Table 3-1 revised July 16, 2007), a guidance document prepared jointly by the US Environmental Protection Agency and Oregon Department of Environmental Quality.

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- Shipper's name and address
- Receiver's name and address
- Signatures of person involved in the chain-of-custody

**Table 2.** This table lists the parameter-specific practical quantitation limits and corresponding human health criteria based on Portland Harbor fish consumption rates. NW Natural should be advised that storm water discharge data must be screened against the human health and ecological screening level values presented in JSCS Table 3-1 to assess potential impacts to the river.

## NEXT STEPS

DEQ does not expect NW Natural to revise and resubmit the Stormwater Pathway Work Plan. DEQ will expect NW Natural to confirm in writing that our comments to the work plan will be incorporated into the sampling and analysis plan and/or future deliverables (e.g., ISCO sampler addendum, final data report), as appropriate.

DEQ appreciates NW Natural's efforts to assess the former Gasco Site stormwater conveyance system as a potential source of contamination to the Willamette River. Please don't hesitate to contact me if you have any questions regarding this letter.

Sincerely,

Dana Bayuk  
Project Manager  
Cleanup & Portland Harbor Section

Cc: Sandy Hart, NW Natural  
Patty Dost, Schwabe Williamson & Wyatt  
Rob Ede, Hahn  
John Edwards, Anchor  
Carl Stivers, Anchor  
Dawn Sanders, City of Portland Bureau of Environmental Services  
Linda Scheffler, City of Portland Bureau of Environmental Services  
Eric Blischke, EPA  
Rene Fuentes, EPA  
Chip Humphries, EPA  
Kristine Koch, EPA  
Sean Sheldrake, EPA  
Tom Gainer, DEQ/PHS  
Henning Larsen, DEQ/SRS  
Matt McClincy, DEQ/PHS  
Karen Tarnow, DEQ/PHS  
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